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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**STIPULATION BETWEEN DEBTOR,
THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS AND
POWERHOUSE TSSP, LLC
RESOLVING POWERHOUSE TSSP,
LLC'S ADMINISTRATIVE CLAIM**

Cash Cloud, Inc. dba Coin Cloud ("Debtor"), debtor and debtor in possession in the above-captioned case (the "Chapter 11 Case"), by and through its counsel, Fox Rothschild LLP, the Official Committee of Unsecured Creditors (the "Committee"), by and through its counsel, McDonald Carano LLP and Seward & Kissel LLP, and Powerhouse TSSP, LLC ("TSSP", and together with the Debtor and the Committee, the "Parties"), by and through its counsel FisherBroyles, LLP, stipulate and agree as follows (the "Stipulation"):

RECITALS

A. WHEREAS, on February 7, 2023, Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Nevada,

1 commencing the Chapter 11 Case;

2 B. WHEREAS, on July 11, 2023, an *Order Establishing Administrative Claim Bar Date*
 3 *For Filing Proofs Of Administrative Expense Claim And Approving Form, Manner And Sufficiency*
 4 *Of Notice Thereof* [ECF 823] was entered, setting a deadline of July 20, 2023 at 5:00 p.m. (prevailing
 5 Pacific Time) to file a Proof Of Administrative Expense Claim (“Administrative Claim Bar Date”);

6 C. WHEREAS, on July 11, 2023, a *Notice Of Entry Of Administrative Claim Bar Date*
 7 *Order Establishing A Deadline To File Administrative Expense Claims Against The Debtor* [ECF
 8 824] (“Notice Of Bar Date”) was filed setting forth the Administrative Claim Bar Date and related
 9 filing instructions and forms;

10 D. WHEREAS, on July 11, 2023, the Debtor asserts that the Notice of Bar Date was
 11 served on TSSP at the following locations as more fully set forth in the *Certificate Of Service* [ECF
 12 841] filed on July 13, 2023:

13 Power House TSSP LLC
 14 c/o SKR Real Estate Services
 9911 Covington Cross Dr. Ste 100
 Las Vegas, NV 89144-7033

Power House TSSP LLC
 9911 Covington Cross Dr. #100
 Las Vegas, NV 89144-7033

15 PowerHouse TSSP LLC
 16 c/o FisherBroyles, LLP
 Attn: Thomas R. Walker
 3340 Peachtree Rd NE Suite 1800
 Atlanta, GA 30326

TSSP LLC
 Attn: Ofir Hagay
 9275 Russell Rd Ste 235
 Las Vegas, NV 89148

17 TSSP LLC
 18 c/o FisherBroyles, LLP
 Attn: Thomas R. Walker
 3340 Peachtree Rd NE Suite 1800
 Atlanta, GA 30326

Ofir Hagay
 BDumas@skrres.com

19 E. WHEREAS, On September 22, 2023, TSSP filed an Administrative Claim Form
 20 [Claim 210], therein asserting an administrative claim in an amount of \$325,347.99 for “post-petition
 21 rent and related charges due” incurred by the Debtor for the period of February 7, 2023 through March
 22 29, 2023 (the “TSSP Claim”);

23 F. WHEREAS, on October 20, 2023, TSSP filed a *Motion For Leave To File Late Proof*
 24 *Of Administrative Claim Or, In The Alternative, For An Order Vacating The Administrative Claim*
 25 *Bar Date* [ECF 1415] (“Late Filed Clam Motion”), requesting the “court to allow the late filing of

the Administrative Rent Claim, or in the alternative, vacating the Administrative Claim Bar Date Order...”;

G. WHEREAS, the Debtor and the Committee believe that there are grounds to object to the amount of the TSSP Claim;

H. WHEREAS, the Parties believe that a consensual resolution of the TSSP Claim may avoid litigation and subsequent professional fees and expenses, and reduce the size of the TSSP Claim for the benefit of the Debtor’s estate and general unsecured creditors; and

I. WHEREAS the Parties, having negotiated in good faith and desire to resolve the Debtor’s concerns and potential objection to the TSSP Claim.

NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

IT IS STIPULATED AND AGREED that:

1. TSSP shall be allowed an administrative claim of \$69,000.00 (the “Allowed TSSP Claim”) under sections 503(a) and 507(a)(2) of the Bankruptcy Code. The Allowed TSSP Claim shall be deemed “allowed” for all purposes in this Chapter 11 Case.

2. Payment-in-full of the Allowed TSSP Claim shall be made by the Debtor on the Effective Date of the Debtor’s First Amended Chapter 11 Plan of Reorganization.

3. This Stipulation shall be binding upon and inure to the benefit of the Debtor, the Debtor’s estate, the Committee, TSSP as well as their respective heirs, representatives, predecessors, successors (including any Trust) and assigns, as the case may be. This Stipulation shall be binding on any trustee, or examiner appointed in the Chapter 11 Case and on all other creditors and parties in interest in the Chapter 11 Case.

4. Each of the undersigned counsel represents that he or she is authorized to execute this Stipulation on behalf of his or her respective client.

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5. The Parties, the Debtor's Claim Agent and the Liquidating Trustee are authorized to take any and all actions necessary and appropriate to give effect to this Stipulation.

Dated this 5th day of January 2024.

FOX ROTHSCHILD LLP

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